

Exhibit I

T H E | W E X L E R | F I R M LLP

May 18, 2005

Via Facsimile

Ms. Toni-Ann Citera
Jones Day
222 E. 41st Street
New York, NY 10017-6702

Re: *In re Pharmaceutical Industry Average Wholesale Price Litigation*
MDL No. 1456 (D. Mass.)

Dear Toni:

I write to address outstanding issues with regard to Abbott's document production. In order to discuss and narrow the issues in dispute as soon as possible, I propose that we speak about the issues in this letter on Friday, May 20 at 2:00 p.m. Central.¹

Abbott's Responses to Plaintiffs' Omnibus Requests: In Abbott's June 1, 2004 responses to MDL Plaintiffs' Omnibus Requests, Abbott represented that it would produce: (1) electronic sales data from PPD from May 1994-December 31, 2003; (2) electronic sales data for HPD from mid-1996 to December 31, 2003; (3) policies or manuals relating to pricing, marketing, and sales; (4) correspondence with pricing compendia regarding Abbott AWPIDs; (5) price announcements to wholesalers; and (6) documents sufficient to identify Abbott's automated information systems. In addition, Abbott agreed to compile "a list of departments at Abbott with relevant information, including persons responsible for setting the price of Abbott's drugs listed in the AMCC."

First, with the exception of the electronic sales data (where Abbott has identified technical reasons why the data cannot be produced) it does not appear as if Abbott has conducted a search for documents throughout the relevant time period (January 1, 1991 to the present). While Chris Cook's May 25, 2004 letter stated that Abbott intended to address this issue on a case-by-case basis, that response is not sufficient. Instead, as it did with electronic data, it is Abbott's duty to identify any undue burden associated with searching for responsive documents within the relevant time period. Therefore, please either supplement Abbott's production or identify with specificity why responsive documents may not be produced within the entire Class Period.

Second, it does not seem that, with the exception of the electronic sales data, Abbott has produced all responsive documents in the categories it has represented it produced. For example,

¹ If any of the documents requested in this letter will be produced in Abbott's upcoming production, you may advise me of that during that call.

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Ms. Toni-Ann Citera

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although Abbott has produced some communications with publishers, this production does not appear to be complete, as Abbott has not produced notes of any meetings with publishers or any other materials sent to or received from publishers. *See* Omnibus Request Nos. 56-69. And it does not appear as if Abbott has produced any documents sufficient to identify its "automated information systems." Thus, for each category of documents Abbott has agreed to produce, please either confirm that Abbott's production is complete or supplement it within 21 days.

Third, Abbott has not produced any organizational charts or other information sufficient to enable plaintiffs to identify persons with knowledge of the subject areas relevant to this litigation. Obviously this is key information for us to proceed with depositions. Therefore, especially since Abbott has already represented that it would do so, produce those documents immediately.

Fourth, with limited exceptions, Abbott has not produced responsive e-mails. Please confirm that Abbott has searched and will continue to search the e-mails (and archived e-mails) of individuals who may have knowledge about the subject matters at issue in this litigation.

Finally, with regard to the electronic sales data, we assume that, consistent with Fed. R. Civ. P. 26(e), Abbott will be supplementing its production shortly. We also assume that, pursuant to plaintiffs' 30(b)(6) deposition notice that was served May 13, Abbott will advise us of the individuals it intends to identify regarding those areas of inquiry.

We further assume that, pursuant to plaintiffs' April 20, 2005 Rule 30(b)(6) deposition notice, Abbott will advise us of the persons it intends to designate on the subject areas identified in that notice. I did receive your voice mail message and am happy to discuss those issues with you on our meet and confer.

If any of these assumptions are not accurate, please let me know immediately.

Documents Abbott Must Still Produce In Response to Plaintiffs' Omnibus Requests: In addition to the deficiencies identified above, Abbott's production to date is incomplete. Without waiving our position that it is Abbott's duty to locate documents responsive to the Omnibus Requests and without waiving our right to seek additional discovery, it is clear that, at a minimum, and in addition to the categories of documents identified above, Abbott should produce:

Category 1: General Corporate

- Documents containing Abbott's document retention policy during the relevant time period

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Category 2: Trade Associations

- All documents provided to any trade association described in Request No. 8²

Category 5: AWP's and Pricing Related

- All documents in which AWP is defined or discussed (responsive to Request Nos. 14-18) and/or in which Abbott's pricing methodologies are discussed. Although Abbott has provided voluminous price lists, it has not provided other documents responsive to this category. Notably, Abbott has not produced any sales-level detailing reports (Request Nos. 18 and 19).
- Documents concerning the product or geographic markets in which Abbott's AWPIDs compete (Request Nos. 22-23).
- Abbott's strategic and marketing plans (Request No. 24).
- Documents relating to Abbott's earned margin, revenues or profits, and/or per-unit average total cost for its AWPIDs (Request Nos. 28 and 32)

Category 6: Inducements: All documents responsive to Request Nos. 36-42.

Category 7: Marketing Plans and Sales Representatives

- A list of all national sales awards available for each AWPID and the business plans for all recipients thereof (Request Nos. 44 and 45)
- All documents memorializing conversations or meetings between any sales representative and any provider regarding an AWPID or seeking reimbursement for an AWPID (Request Nos. 46, 47, 49, 51, 54)
- All documents where the raising of or use of AWP as a marketing tool was discussed (Request Nos. 50, 53)
- All marketing or sales plans that discuss any item identified in Request No. 55.

Category 8: Publishers. See discussion above.

² We assume based on Chris Cook's previous correspondence that Abbott has produced all documents previously provided to any governmental entity (Categories 3 and 4 of the Omnibus Requests). If this is not the case and Abbott is withholding otherwise responsive, non-privileged documents, please advise.

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Category 9: PBMs; Wholesalers

- All documents and communications regarding Abbott's contractual negotiations with PBMs, wholesalers, manufacturers, pharmacies, and/or providers.
- All documents related to payments (chargebacks, rebates, credits, *etc.*) made to any of the above entities.

Category 10: Communications With Other Manufacturers

- Abbott has not produced any documents responsive to Request No. 81.

Category 11: Miscellaneous

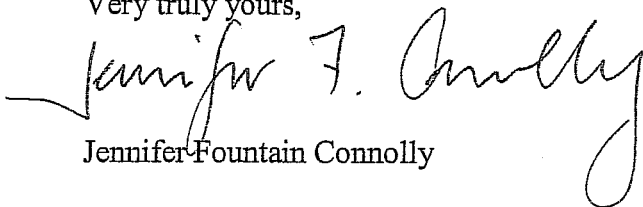
- Abbott has not produced any documents responsive to Request No. 82.

We are willing to discuss these categories with you; however, because many of these documents go to the heart of plaintiffs' allegations, Abbott cannot just refuse to produce them. Indeed, doing so is inconsistent with Chris Cook's previous representation to Beth Fegan in his May 6, 2004 letter that Abbott was not going to refuse outright to produce any category of documents sought in the Omnibus Requests.

Privilege Log. Finally, Abbott has not provided us with a log of documents withheld pursuant to any applicable privilege. I understand that Laura Dahl has represented that Abbott will be providing one shortly. Please provide that within fourteen (14) days.

Please call me or Beth Fegan with any questions. I look forward to working with you.

Very truly yours,



Jennifer Fountain Connolly

JFC:lmv

cc: Beth Fegan

Exhibit J

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COPY

May 26, 2005

Via Facsimile

Ms. Toni-Ann Citera
Jones Day
222 E. 41st Street
New York, NY 10017-6702

Ms. Beth A. O'Connor
Jones Day
77 West Wacker Dr.
Chicago, IL 60601-1692

Re: *In re Pharmaceutical Industry Average Wholesale Price Litigation*
MDL No. 1456 (D. Mass.)

Dear Toni and Beth:

Thank you for speaking with me yesterday. This letter will memorialize the contents of our discussion. If there is anything inaccurate in this letter, please let me know.

Abbott's Ongoing Production: You advised me that the CD-ROM production would be completed on June 13. I informed you that this was inconsistent with the position taken by Laura Dahl, who indicated we would have the production at the beginning of this week. Based on some of the technical difficulties Abbott has experienced in imaging the documents, we agreed that Abbott would produce CD-ROMs to us on a rolling basis that would in all cases be completed by June 13. You also agreed to make Abbott's organizational charts among the first documents that are produced to us on CD-ROM so that we can begin making decisions about depositions. (Abbott has already agreed to compile "a list of departments at Abbott with relevant information, including persons responsible for setting the price of Abbott's drugs listed in the AMCC.")

In addition, you advised me that Abbott intends to do a "rolling production" for documents otherwise responsive to plaintiffs' Omnibus Requests. I told you that, because of the discovery deadlines, a rolling production would be unacceptable unless we saw a definitive end in sight. You agreed to investigate providing me with a date.

When I asked you to identify the differences between the CD-ROM production and the rolling production, you stated that most of the documents in the CD production would be from the government productions, although there were about six boxes of documents that were responsive to the Omnibus Requests. I therefore asked you to provide us with a source list or, at minimum, a list of the persons whose offices Abbott has searched and intends to search. Please provide this list by Monday, June 6.

Contact Information:

Jennifer Fountain Connolly
312 261 6195 Direct Dial
jfconnolly@wexlerfirm.com

One North LaSalle Street
Suite 2000
Chicago, Illinois 60602

312 346 2222
312 346 0022 fax
www.wexlerfirm.com

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We further discussed Abbott's position that it would address whether to produce documents from the entire Class Period (January 1, 1991 to the present) on a case-by-case basis. You informed me that Abbott is not withholding documents from earlier time periods that are otherwise responsive; however, you stated that there are certain places where Abbott has not searched for responsive documents. The only concrete example that you were able to identify was microfiche. First, we need to know what is contained on those microfiche. Second, we would like a complete list of the areas which Abbott has outright refused to search based on its time period objection. Please provide that to me by Friday, June 3.¹

Electronic Sales Data:

In addition, you indicated that Abbott would be producing Bruce Stowell as Abbott's designee pursuant to our 30(b)(6) notice on data. We agreed to interview Mr. Stowell by telephone in lieu of a deposition. Of course, if he is non-responsive, we reserve the right to reschedule the deposition. We are available on June 21 and would like to begin the telephone conference at 10:00 a.m. Central time. Please let us know the number(s) we should call on that date.

You agreed to provide me with Abbott's designee on indirect sales/chargeback data (for PPD) by Friday, May 27. You also informed me that, though Abbott spun off its hospital division last year, Abbott will agree to provide a designee for Hospira (the new spun-off entity).

You agreed to identify Abbott's designees with respect to plaintiffs' second 30(b)(6) notice by next week. You also informed me that Abbott would be providing a revised data set for one of its divisions (but you did not recall which division) in one week.

As initially raised by Chris Cook, you asked me if plaintiffs would consider limiting the number of Abbott AWPIDs. I informed you that we would be willing to engage in this inquiry if Abbott would provide us with the data and more detailed information to enable us to do so. You said that you would follow-up on this.

Further, you advised me that Abbott is not willing to supplement its electronic sales data production beyond December 31, 2003. Although you provided me with Abbott's legal position on this issue, you did not provide me with details regarding any undue burden

¹ You informed me this is not an issue with regard to TAP because Prevacid was introduced in 1995.

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Abbott would incur in supplementing this information. You advised me that Mr. Stowell would be able to address this. We will deal with the issue at that point.

Finally, I advised you that I will be sending you a letter under separate cover regarding the deficiencies in Abbott's electronic data production to date.

E-Mail: You stated that Abbott has produced e-mail that was contained in paper form and that the e-mails produced in paper form were produced in the form maintained in the ordinary course of business. Beth will get back to me regarding the manner in which Abbott intends to proceed with searching. I agreed to provide you with a list of terms to search. I would like to know how Abbott intends to proceed with those searches by Friday, June 3.

Privilege Log. Abbott agreed to provide a privilege log for the CD-ROM production by June 8, 2005.

Documents Abbott Must Still Produce In Response to Plaintiffs' Omnibus Requests: Finally, we discussed the specific categories in the Omnibus Requests for which plaintiffs believe Abbott has not yet produced responsive documents. You advised me that many of these documents were being produced in the CD production. Specifically,

Category 1: General Corporate

- You informed me that Abbott's document retention policy during the relevant time period would be produced in the CD production.

Category 2: Trade Associations

- You said that these documents would be contained in the rolling production. To your knowledge, Abbott is not withholding responsive documents in this category; however, you agreed to confirm this. Please advise me of this by Friday, June 3.

Category 5: AWP's and Pricing Related

- You stated that Abbott did not have many responsive documents defining AWP; however, the vast majority of them will be contained in the CD production. You stated that there would be documents relating to Abbott's

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pricing methodologies (other than just Abbott price lists) in the rolling production.

- You stated that most marketing plans would be in PPD and would be produced in the rolling production.
- You stated that, although Abbott would produce documents related to its revenues (in its electronic sales data), that Abbott would not produce any documents regarding its profits and/or per-unit average total cost for its AWPIDs.

Category 6: Inducements:

- You stated that Abbott has provided rebate, chargeback, and discount data in its electronic sales data.
- You did not believe that Abbott had many documents regarding free samples given to physicians. However, Abbott will produce all responsive documents.
- Finally, you will advise me whether Abbott is withholding any documents in this category. Please let me know by Friday, June 3.

Category 7: Marketing Plans and Sales Representatives

- We discussed plaintiffs' need for sales representative call notes. You informed me that Abbott does not have these documents in electronic form. You stated that Abbott has produced some notes from the offices of its National Account Managers because these documents were produced in the government productions; however, the offices of individual sales representatives have not been searched. You indicated a desire to limit this search. I advised you that plaintiffs could not take a position on this issue without organization charts and reviewing the documents in Abbott's CD production. I also advised you that providing us with list of all national sales awards available for each AWPID and the business plans for all recipients thereof (Request Nos. 44 and 45) as soon as possible would assist us in making decisions about this issue. You also did not know if there was any overlap between sales notes that might be found in the offices of individual sales representatives and those in the offices of National Account Managers.

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We will require answers to these types of questions and need to revisit these issues soon.

- You informed me that Abbott does not have many documents where the raising of or use of AWP as a marketing tool was discussed (Request Nos. 50, 53); however, you represented that these would be in the CD production as part of Abbott's government production.

Category 8: Publishers.

- You advised me that these documents would be contained in the CD production. You told me that you would attempt to produce these documents earlier rather than later in the production.

Category 9: PBMs; Wholesalers

- You stated that, for PPD, Abbott will produce all PBM contracts. You will investigate whether Abbott can produce all wholesaler contracts. (I told you that since there are only three full-line wholesalers that should not be an issue.) You also agreed that, if Abbott is producing only a "sampling" of certain categories of responsive documents, you will advise me of that so that I may ask you for additional documents or a full production if we need it. I assume that you will do this for Abbott's entire production. If this is not the case, please advise.

Category 10: Communications With Other Manufacturers

- You stated Abbott has no responsive documents.

Category 11: Miscellaneous

- You stated that, with regard to Request No. 82, you did not believe Abbott has any repackaged or relabeled AWPIDs. You will confirm this to me.

TAP documents. I agreed to provide you with dates during which we could re-review the TAP documents at your Chicago office. We are available June 2, 6 or 9. Please advise which of these dates works for Beth.

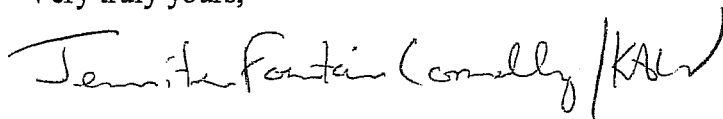
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We also need to talk about TAP's 30(b)(6) designees. I will call you after the Memorial Day holiday to get the names of those individuals.

Please call me or Beth Fegan with any questions.

Very truly yours,

A handwritten signature in cursive script that reads "Jennifer Fountain Connolly" followed by the initials "KAC" and a checkmark.

Jennifer Fountain Connolly

JFC:lmv

cc: Beth Fegan
Kenneth A. Wexler

Exhibit K

JONES DAY

77 WEST WACKER • CHICAGO, ILLINOIS 60601-1892
TELEPHONE: (312) 782-3939 • FACSIMILE: (312) 782-8585

Direct Number: (312) 269-1529
baconnor@jonesday.com

May 27, 2005

VIA FACSIMILE

Jennifer Fountain Connolly
One North LaSalle Street
Suite 2000
Chicago, Illinois 60602

Re: *In re Pharmaceutical Industry Average Wholesale Price Litigation*
MDL No. 1456 (D. Mass.)

Dear Jennifer:

I am writing in response to your May 26, 2005 letter, in which you purport to summarize the contents of our discussion on May 25, 2005. I will be sending you a more comprehensive letter next week, but I wanted to clarify a few points right away as well as provide immediate responses to some of your requests.

ABBOTT'S ONGOING DOCUMENT PRODUCTION

As an initial matter, Abbott is cooperating and working diligently with you to produce responsive documents within a reasonable time period. After nearly a year of no communication from plaintiffs regarding Abbott's document production, you have expressed a sense of urgency for the receipt of documents. Despite plaintiffs' delay, Abbott will make a good faith effort to produce to plaintiffs, on a rolling basis, responsive documents as quickly as possible.

Your letter suggests that Abbott has committed to producing documents in response to most of the "categories" of documents identified in your May 18, 2005 letter. We did not make such a commitment in many instances, but rather said that we would get back to you as to what Abbott will and will not agree to produce. We hope to get back to you shortly. Moreover, there are several deadlines in your letter, many of which are as early as next week. I will take up these matters with the client and get back to you as soon as possible, but I cannot promise that all of your deadlines will be met, especially given that it is a holiday weekend.

As we agreed, you will receive Abbott's CMO 5 and CMO 10 production on a rolling basis via CD-ROM, which is to be completed by June 13, 2005. As you know, paper copies of these documents were made available to plaintiffs last year, but were never copied. We also discussed that Abbott would produce to you additional responsive documents on a rolling basis. You responded that production on a rolling basis is not acceptable unless there is an "end date" for the production. Providing you with such an "end date" is not, at this juncture, feasible, particularly since we are still waiting for plaintiffs to "triage" the Abbott drugs named in this case, as was promised last year. Until this is done, Abbott cannot know how long it will take to

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Jennifer Connolly
May 27, 2005
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collect and produce responsive documents and, therefore, Abbott is unwilling to subject itself to such a deadline. To the extent there are particular documents you want sooner in the rolling production, please let me know and we will try to accommodate your request. You also stated that you need "more detailed information" in addition to the electronic sales data already produced in order to determine how to limit the number of drugs. Please advise as to what additional information you believe you need for this inquiry.

30(B)(6) DESIGNEES

You have agreed to interview Bruce Stowell in lieu of a deposition on June 21, 2005, beginning at 10:00 a.m. (CDT) regarding Abbott's direct sales data (for both the Pharmaceutical Products Division and the Hospital Products Division) and TAP's direct sales data. The call-in number and passcode for this interview are:

1-866-448-1308
57177138

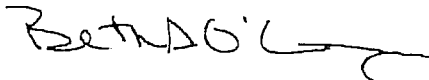
We have not yet located the appropriate individual who can discuss Abbott's or TAP's indirect sales data. We will inform you as soon as we have located someone who is knowledgeable in these areas. In addition, Abbott has agreed to provide a designee for what was formerly known as Abbott's Hospital Products Division ("HPD"). Although the individual for HPD will be from Hospira, he or she will be interviewed as or deposed as a corporate designee for Abbott, not Hospira as you suggest.

REVIEW OF TAP DOCUMENTS

I am available on Thursday, June 9, 2005, for you to visit our offices in Chicago to review TAP documents. As you know, these documents were made available to plaintiffs last year, but were never copied. The documents will be available beginning at 9:00 a.m. Please ask for me at the reception desk when you or your colleagues arrive.

Again, I will be sending you a more detailed letter next week in response to the remainder of your letter. We look forward to working with you on these issues.

Sincerely,



Beth A. O'Connor

Jennifer Connolly
May 27, 2005
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cc: Beth Fegan
Toni-Ann Citera
Laura Dahl

Exhibit L

THE | WEXLER | FIRM ^{LLP}

May 31, 2005

Via Facsimile

Ms. Beth A. O'Connor
Jones Day
77 West Wacker Drive
Chicago, IL 60601-1692

Re: *In re Pharmaceutical Industry Average Wholesale Price Litigation*
MDL No. 1456 (D. Mass.)

Dear Beth:

I do not think it is efficient for us to get into a letter writing campaign. My May 26, 2005 letter was cordial and merely sought commitments from Abbott with regard to its production obligations. If Abbott intends to comply with those obligations, we can move forward. If it does not, then we should identify issues quickly to seek Court intervention if necessary.

First, the fact that Abbott had "no communication" from plaintiffs regarding its production did not relieve Abbott of its obligations to produce documents responsive to plaintiffs' Omnibus Requests. By your own admission, Abbott has had nearly a year to locate responsive documents.

Second, with regard to the deadlines in my letter, the vast majority of those deadlines were dates provided by you during our May 25 call. If Abbott has specific objections to other deadlines, then we can address those. However, a general objection to all deadlines set forth in my letter is not appropriate.

Third, right now all of Abbott's AWPIDs are at issue in this case. Plaintiffs never agreed and will not agree to "triage" the Abbott drugs at issue until we have the data sufficient to be able to do this. Regarding the more detailed information plaintiffs will require, as I told you on May 25 and set forth in my May 26 letter, I will be providing you a letter shortly setting forth the deficiencies in Abbott's electronic sales data which will describe what plaintiffs require.

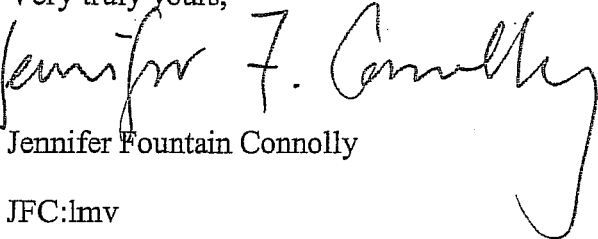
Finally, your letter mentions Abbott and TAP designees for the data 30(b)(6) notice. It does not mention their designees for plaintiffs' second 30(b)(6) notice. Please advise when Abbott and TAP will identify those individual(s).

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Ms. Beth A. O'Connor
May 31, 2005
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Please call me or Beth Fegan with any questions.

Very truly yours,

A handwritten signature in cursive script, reading "Jennifer F. Connolly". The signature is written in dark ink and is positioned to the left of the printed name.

Jennifer Fountain Connolly

JFC:lmv

cc: Beth Fegan
Toni-Ann Citera
Kenneth A. Wexler

Exhibit M

JONES DAY

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baoconnor@jonesday.com

June 6, 2005

VIA HAND DELIVERY

Jennifer Fountain Connolly
One North LaSalle Street
Suite 2000
Chicago, Illinois 60602

Re: *In re Pharmaceutical Industry Average Wholesale Price Litigation*
MDL No. 1456 (D. Mass.)

Dear Jennifer:

I am writing as a follow-up to my May 27, 2005 letter to you regarding issues raised during our May 25, 2005 conference call.

As requested, we are producing organizational charts with this letter, which have been labeled as ABT AWP/MDL 07125 - ABT AWP/MDL 071324. These charts should allow you to begin making decisions regarding individuals who you may want to depose. I have also enclosed a CD-ROM, ABT AWP/MDL 071325, which contains the first of the government productions. Please note that this CD-ROM has been designated "Highly Confidential" and the documents contained in the CD-ROM have been marked confidential as appropriate. Additional CD-ROMs, which are also responsive to CMO 5 and CMO 10, will be produced as they become available.

You requested a source list or the names of individuals whose offices Abbott has searched. I am investigating whether there were any such source lists created for the government productions. As you know, these productions occurred several years ago and if there were no source lists created at the time, then it will not be possible to produce such lists.

You also requested a list of areas that Abbott has refused to search based on a time period objection. After discussing this topic, there do not appear to be any areas that Abbott has refused to search for responsive documents. Without waiving any prior objections relating to the scope of the purported class period and plaintiffs' document requests, Abbott has searched historical records that have been maintained in its corporate records department and will continue to produce responsive documents it locates that date back to 1991.

We discussed the need to limit e-mail searches to certain individuals and key word terms. You indicated that you would provide a list of terms to search. I have not yet received such a list. Also, the organizational charts you received should help you limit the individuals for whom you would like e-mails, to the extent such e-mails exist. Please feel free to call me to discuss this process in more detail.

As we discussed previously, Abbott will provide an initial privilege log on June 8, 2005.

CHI-1480194v1

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Jennifer Connolly
June 6, 2005
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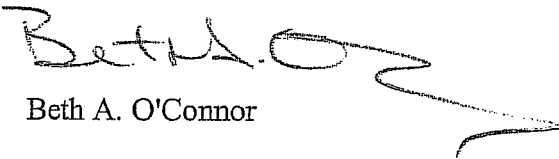
Also, with respect to the categories of documents identified in your May 26, 2005 letter that are still outstanding, Abbott is still investigating the following categories: trade associations; sales representatives' call notes; types of national sales awards; wholesaler contracts; and communications with other manufacturers. In addition, although Abbott does not believe any such documents exist, it will produce marketing plans that discuss marketing AWP and documents where the raising of or use of AWP as a marketing tool was discussed.

Abbott does not have any documents relating to samples used as "inducements" as you described in our May 25, 2005 call.

Finally, I am in the process of responding to your June 1, 2005 requesting additional information relating to Abbott sales data. I will forward that information to you as soon as possible.

In the meantime, please contact me with any additional questions or requests.

Sincerely,



Beth A. O'Connor

cc: Beth Fegan (via facsimile w/o enclosures)
Tina Tabacchi
Toni-Ann Citera
Laura Dahl

Exhibit N

JONES DAY

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June 8, 2005

VIA HAND DELIVERY

Jennifer Fountain Connolly
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Suite 2000
Chicago, Illinois 60602

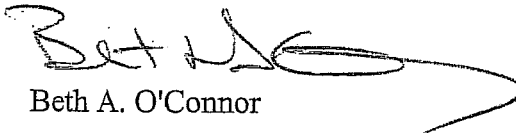
Re: *In re Pharmaceutical Industry Average Wholesale Price Litigation*
MDL No. 1456 (D. Mass.)

Dear Jennifer:

As we discussed during our May 25, 2005 conference call, I am providing Abbott's initial privilege log, which will be supplemented as necessary. In addition, I have enclosed a CD-ROM, ABT AWP/MDL 071326, which contains more of the government productions that are responsive to CMO 5 and CMO 10. Please note that this CD-ROM has been designated as "Highly Confidential" and the documents contained therein have been marked confidential as appropriate. Additional CD-ROMs will be produced as they become available.

Please contact me with any questions.

Sincerely,


Beth A. O'Connor

cc: Beth Fegan (via facsimile w/o enclosures)
Toni-Ann Citera
Laura Dahl

CHI-1481905v1

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Exhibit O

JONES DAY

77 WEST WACKER • CHICAGO, ILLINOIS 60601-1692
TELEPHONE: (312) 782-3939 • FACSIMILE: (312) 782-8585

Direct Number: (312) 269-1529
baoconnor@jonesday.com

June 10, 2005

VIA HAND DELIVERY

Jennifer Fountain Connolly
The Wexler Firm
One North LaSalle Street
Suite 2000
Chicago, Illinois 60602

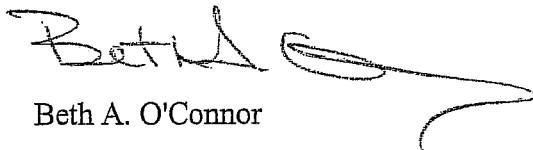
Re: *In re Pharmaceutical Industry Average Wholesale Price Litigation*
MDL No. 1456 (D. Mass.)

Dear Jennifer:

I have enclosed four CD-ROMs, ABT AWP/MDL 071327 - ABT AWP/MDL 071330, which contain more of the government productions that are responsive to CMO 5 and CMO 10. Please note that these CD-ROMs have been designated as "Highly Confidential" and the documents contained therein have been marked confidential as appropriate. Additional CD-ROMs will be produced as they become available.

Please contact me with any questions.

Sincerely,


Beth A. O'Connor

cc: Beth Fegan (via facsimile w/o enclosures)
Toni-Ann Citera
Laura Dahl

CHI-1482404v1

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Exhibit P

JONES DAY

77 WEST WACKER • CHICAGO, ILLINOIS 60601-1692
TELEPHONE: (312) 782-3939 • FACSIMILE: (312) 782-8585

Direct Number: (312) 269-1529
baoconnor@jonesday.com

June 13, 2005

VIA HAND DELIVERY

Jennifer Fountain Connolly
The Wexler Firm
One North LaSalle Street
Suite 2000
Chicago, Illinois 60602

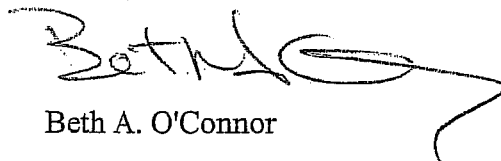
Re: *In re Pharmaceutical Industry Average Wholesale Price Litigation*
MDL No. 1456 (D. Mass.)

Dear Jennifer:

I have enclosed the last five CD-ROMs, ABT AWP/MDL 071331 - ABT AWP/MDL 071335, which contain the remainder of the government productions that are responsive to CMO 5 and CMO 10. Please note that these CD-ROMs have been designated as "Highly Confidential" and the documents contained therein have been marked confidential as appropriate. In addition, I have enclosed a print out of the "Class of Trade" codes, which you requested. This print-out has been bates labeled ABT AWP/MDL 171336 - ABT AWP/MDL 071370, and designated as "Highly Confidential."

Please contact me with any questions.

Sincerely,



Beth A. O'Connor

cc: Beth Fegan (via facsimile w/o enclosures)
Toni-Ann Citera
Laura Dahl

CHI-1482619v1

ATLANTA • BEIJING • BRUSSELS • CHICAGO • CLEVELAND • COLUMBUS • DALLAS • FRANKFURT • HONG KONG • HOUSTON
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Exhibit Q

THE | WEXLER | FIRM ^{LLP}

July 19, 2005

COPY

Via Facsimile

Ms. Beth A. O'Connor
Jones Day
77 West Wacker Dr.
Chicago, IL 60601-1692

Re: *In re Pharmaceutical Industry Average Wholesale Price Litigation*
MDL No. 1456 (D. Mass.)

Dear Beth:

Thank you for speaking with me on Friday regarding issues raised in my July 8 letter. This letter will memorialize that discussion. If you have a different understanding of any of these areas, please let me know.

39(b)(6) Depositions: You advised me that it was likely that Abbott would designate Mike Sellers for all topics set forth in plaintiffs' April 20, 2005 deposition notice. However, you advised me that Abbott might need to designate supplemental witnesses. I told you that plaintiffs were willing to go forward with the deposition of Mr. Sellers and revisit the possibility of Abbott's designating supplemental witnesses based on the topics to which Mr. Sellers will be able to testify. You expected to be able to get back to me at the end of this week regarding proposed dates for Mr. Sellers' deposition.

Source Lists: You told me that Abbott did not maintain a source list for its government production but would be producing source sheets on an ongoing basis that will identify the individual and department from whose files produced documents come.

E-Mail: Regarding active e-mail, you asked me to begin to compile a list of employees whose e-mail plaintiffs would like Abbott to search. I am willing to give you such a list – and will shortly – but given the relatively early stage of discovery, plaintiffs cannot possibly identify every individual whose e-mail should be searched. Therefore, we will expect Abbott's cooperation in identifying supervisors, reports, etc. of the individuals we identify so that a complete list may be compiled. We also expect Abbott to satisfy its obligation to search the e-mail of individuals whom Abbott has reason to believe may have documents that may lead to the discovery of admissible evidence.

Regarding archived e-mail, you advised me that Abbott is currently consulting with a third party vendor regarding searching back-up tapes. You advised me that you would update me on the status of that project at the end of this week.

Contact Information:

Jennifer Fountain Connolly
312 261 6195 Direct Dial
jfconnolly@wexlerfirm.com

One North LaSalle Street
Suite 2000
Chicago, Illinois 60602

312 346 2222
312 346 0022 fax
www.wexlerfirm.com

THE | WEXLER | FIRM LLP

Ms. Beth A. O'Connor
July 19, 2005
Page 2

Documents Abbott Must Still Produce In Response to Plaintiffs' Omnibus Requests:

- You told me that Abbott is still looking for documents relating to trade associations.
- We had a lengthy discussion regarding how Abbott will search for sales representative call notes. You advised me that, because the maintenance of these notes is determined manager-by-manager, it might be difficult to develop a plan to find these documents. I suggested to you that, because of the uncertainties in the structure of the sales department, plaintiffs might notice a 30(b)(6) deposition on the subject. You asked that I forego that pending your discussion with your client and advised me that we could discuss this at the end of this week.
- I advised you that, with regard to wholesaler contracts, plaintiffs were most interested in contracts with what is now known as the Big Three (McKesson, AmeriSource Bergen, and Cardinal). You said that, although Abbott had produced some of these contracts, you would confirm that plaintiffs had or would soon receive a complete set.
- You advised me that the only communications with other manufacturers that Abbott had were co-marketing agreements. I told you that we would be interested in those documents if they related to AWPIDs. You told me that you would look into this.
- You told me that the HPD focus in the government production is due to the fact that those investigations focused on HPD drugs. You informed me that an "aggressive collection" of PPD documents is ongoing and that those documents would be produced on a rolling basis and would begin at the end of the month (July). I told you that, as long as Abbott's production was conducted in good faith (*i.e.*, Abbott did not hold off on producing responsive documents until the very end and did not otherwise engage in a document dump), I was willing to work with you. I expect that we will have ongoing discussions on this subject and will revisit it regularly.

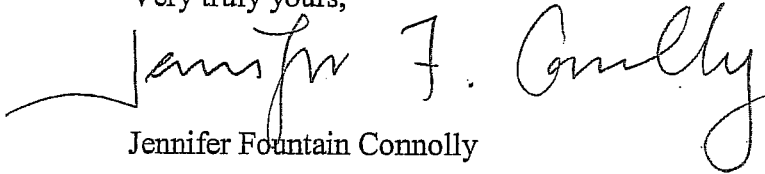
Electronic Sales Data: Finally, thank you for agreeing to postpone the July 15 electronic sales data interviews. I have since spoken with our experts and believe that we should have the continued interviews – which would include the HPD indirect sales data – any time August 10-12, 2005. Please get back to me on acceptable dates so that we can get those on the calendar.

T H E | W E X L E R | F I R M ^{LLP}

Ms. Beth A. O'Connor
July 19, 2005
Page 3

I look forward to speaking with you again on Friday.

Very truly yours,

A handwritten signature in cursive script, reading "Jennifer F. Connolly". The signature is written in dark ink and is positioned above the printed name.

Jennifer Fountain Connolly

JFC:lmv

cc: Toni-Ann Citera (via facsimile)
Beth Fegan (via facsimile)
Kenneth A. Wexler

Exhibit R

JONES DAY

77 WEST WACKER • CHICAGO, ILLINOIS 60601-1692
TELEPHONE: 312-782-3939 • FACSIMILE: 312-782-8585

Direct Number: 312/269-1529
baoconnor@jonesday.com

November 4, 2005

VIA MESSENGER

Jennifer Fountain Connolly, Esq.
The Wexler Firm LLP
One North LaSalle Street, Suite 2000
Chicago, Illinois 60602

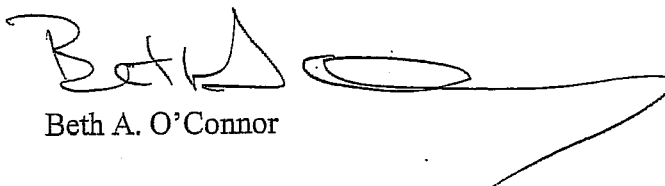
Re: In Re Pharmaceutical Industry Average Wholesale Price Litigation,
MDL 1456 (D. Mass.)

Dear Jennifer:

I am sending you the two enclosed CD-ROMs that contain additional Abbott production documents. The documents contained therein are labeled ABT AWP/MDL 076415 - ABT AWP/MDL 087092 and have been designated confidential as appropriate.

Please contact me if you have any questions.

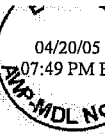
Sincerely,


Beth A. O'Connor

cc: Toni-Ann Citera

CHI-1504789v1

Exhibit S



NITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESALE PRICE
LITIGATION

MDL No. 1456

CIVIL ACTION: 01-CV-12257-PBS

THIS DOCUMENT RELATES TO ALL
CLASS ACTIONS

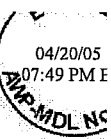
Judge Patti B. Saris

NOTICE OF RULE 30(b)(6) DEPOSITION

TO: ALL COUNSEL OF RECORD VIA VERILAW:

PLEASE TAKE NOTICE THAT pursuant to Rules 26 and 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiffs will take the deposition upon oral examination of a representative of Abbott, who is knowledgeable regarding the matters designated on attached Exhibit "A." The deposition shall take place on June 6, 2006 at 9:00 a.m., and shall continue until concluded at the offices of Hagens Berman Sobol Shapiro LLP, 60 West Randolph Street, Suite 200, Chicago, IL 60601.

Testimony will be recorded and transcribed by a court reporter, for use at trial and all other purposes permissible under the Federal Rules of Civil Procedure. You are invited to attend and participate.



DATED: April 20, 2005

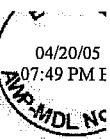
By /s/ Steve W. Berman
Thomas M. Sobol (BBO#471770)
Edward Notargiacomo (BBO#567636)
Hagens Berman Sobol Shapiro LLP
One Main Street, 4th Floor
Cambridge, MA 02142
Telephone: (617) 482-3700
Facsimile: (617) 482-3003
LIAISON COUNSEL

Steve W. Berman
Sean R. Matt
Hagens Berman Sobol Shapiro LLP
1301 Fifth Avenue, Suite 2900
Seattle, WA 98101
Telephone: (206) 623-7292
Facsimile: (206) 623-0594

Elizabeth Fegan
Hagens Berman Sobol Shapiro LLP
60 W. Randolph Street, Suite 200
Chicago, IL 60601
Telephone: (312) 762-9235
Facsimile: (312) 762-9286

Eugene A. Spector
Jeffrey Kodroff
Spector, Roseman & Kodroff, P.C.
1818 Market Street, Suite 2500
Philadelphia, PA 19103
Telephone: (215) 496-0300
Facsimile: (215) 496-6611

Marc H. Edelson
Allan Hoffman
Hoffman & Edelson
45 West Court Street
Doylestown, PA 18901
Telephone: (215) 230-8043
Facsimile: (215) 230-8735



Kenneth A. Wexler
Jennifer F. Connolly
The Wexler Firm LLP
One North LaSalle Street, Suite 2000
Chicago, IL 60602
Telephone: (312) 346-2222
Facsimile: (312) 346-0022

Samuel D. Heins
Alan I. Gilbert
Susan E. MacMenamin
Heins, Mills & Olson, P.C.
3550 IDS Center
80 South Eighth Street
Minneapolis, MN 55402
Telephone: (612) 338-4605
Facsimile: (612) 338-4692
**CO-LEAD COUNSEL FOR
PLAINTIFFS**

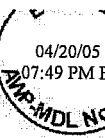


EXHIBIT "A"

INSTRUCTIONS

All of the definitions from Plaintiffs' Omnibus Requests for Production of Document Directed to All Defendants are incorporated herein by reference.

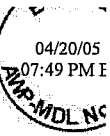
"AWPID" refers to all of the drugs identified in Appendix A to the AMCC.

"Spread" refers to the difference between AWP or any price upon which reimbursement for a drug is based, on the one hand, and the actual or net price paid for a drug on the other hand.

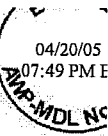
Unless otherwise specifically stated, each of these Areas of Inquiry encompasses the years 1991 through the present and focuses only on physician-administered AWPIDs.

AREAS OF INQUIRY

1. The identity of documents describing how prices on physician-administered drugs are established and the identity of persons with knowledge on this issue.
2. The identity of documents describing the price paid by physicians or others reimbursing for physician-administered drugs, and the identity of persons with knowledge on this subject
3. The types of materials maintained by the sales force, including "detail" reports, field sales notes, and electronic databases.
4. Communications, oral or written, with publishers on any of the following: list price, AWP, net price, suggested wholesale price, WAC, or any other communication with publishers.
5. The identity and nature of the competitive drugs with respect to each physician-administered AWPID.



6. The ASPs on each AWPID and the spread between ASP and AWP, and how defendant calculates ASP.



CERTIFICATE OF SERVICE

I hereby certify that I, Steve W. Berman, an attorney, caused a true and correct copy of the foregoing, **NOTICE OF RULE 30(B)(6) DEPOSITION** to be delivered to all counsel of record by electronic service pursuant to Paragraph 11 of the Case Management Order No. 2, by sending on April 20, 2005, a copy to Verilaw Technologies for Posting and notification to all parties

By /s/ Steve W. Berman
Steve W. Berman
HAGENS BERMAN SOBOL SHAPIRO LLP
1301 Fifth Avenue, Suite 2900
Seattle, WA 98101
(206) 623-7292

Exhibit T

THE | WEXLER | FIRM ^{LLP}

July 8, 2005

Via Facsimile

Ms. Beth A. O'Connor
Jones Day
77 West Wacker Dr.
Chicago, IL 60601-1692

Re: *In re Pharmaceutical Industry Average Wholesale Price Litigation*
MDL No. 1456 (D. Mass.)

Dear Beth:

I am writing to follow-up on some issues remaining from my May 25 letter and that have arisen in examining Abbott's document production.

30(b)(6) Depositions: First, on April 20, 2005 plaintiffs noticed a 30(b)(6) deposition for six areas of inquiry. Pursuant to CMO No. 10, Abbott must designate individuals within 45 days; however, it has not done so. I will contact you next week to schedule these depositions.

Source Lists: You advised me in your June 6 letter that you were in the process of determining whether Abbott maintained a source list for documents produced to the government. Please let me know the status of that search. In addition, we have not received a source list for Abbott's initial production; please advise whether one will be forthcoming.

E-Mail: You have asked me to provide you a list of terms to search e-mail. We suggest that Abbott search for the following terms. Please let me know when you think this search might be completed.¹

AWP/Average Wholesale Price
WAC/Wholesale Acquisition Cost
Direct Price
Return on Investment/ROI
Sample(s)
Reimbursement

Spread
Return to Practice/RTP
Catalog Price
Profit
Educational Grant(s)
Rebate(s)

¹ Plaintiffs obviously have not had the time to examine the CD-ROMs Abbott recently produced. To the extent that the review of those documents reveal Abbott-specific terms that should be included in this list, plaintiffs reserve the right to make additional requests.

T H E | W E X L E R | F I R M LLP

Ms. Beth A. O'Connor
July 8, 2005
Page 2

ASP/Actual Sales Price
Discount(s)
Free
Formulary

Medicare Part B
Margin
Incentive
Complementary

Documents Abbott Must Still Produce In Response to Plaintiffs' Omnibus Requests:

In your June 6 letter you advised that Abbott was still investigating the following categories of documents. Please advise both whether Abbott intends to produce these categories of documents and when that production will be forthcoming.

- Trade associations (Category 2)
- Sales Representatives' Call Notes and Types of National Sales Awards (Category 6). We need to discuss how and in what way Abbott intends to search the offices of individual sales representatives – especially because Abbott does not maintain call notes in electronic form. I propose that we discuss this issue next week. During that call I will want to know, for example, whether there is any overlap between sales notes that might be found in the offices of individual sales representatives and those in the offices of National Account Managers (which you have told me we will find in Abbott's production).
- Wholesaler contracts (Category 9). Your June 6 letter says that Abbott is investigating this area. Please let me know the status on this. It did appear that some of these contracts were in Abbott's CD production.
- Communications with other manufacturers (Category 10). Please let me know if Abbott has looked for this category of documents.
- Finally, it appears that the vast majority of Abbott's recent CD-ROM production related to the HPD side of the business. Please advise me the reason for this. You told me that the CD production would be mostly the government production, but would also include some documents generally responsive to the Omnibus Requests; however, it appears from your cover letters that the CD production is entirely from the government production. If this accounts for the HPD focus, then let me know.

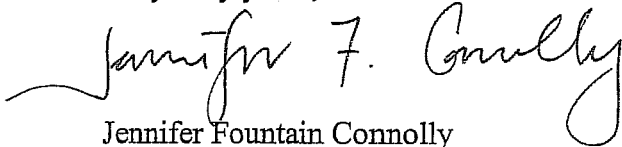
Abbott's Ongoing Production: Finally, overall, we still need to discuss the anticipated volume and content of Abbott's ongoing production and the efforts Abbott is making to complete this on a timely basis.

T H E | W E X L E R | F I R M LLP

Ms. Beth A. O'Connor
July 8, 2005
Page 3

I look forward to talking with you next week. In the meantime, please call me or Beth Fegan with any questions.

Very truly yours,

A handwritten signature in black ink, reading "Jennifer F. Connolly". The signature is fluid and cursive, with a large, stylized "J" and "C".

Jennifer Fountaine Connolly

JFC:lmv

cc: Toni-Ann Citera (via facsimile)
Beth Fegan
Kenneth A. Wexler

Exhibit U

JONES DAY

77 WEST WACKER • CHICAGO, ILLINOIS 60601-1692
TELEPHONE: (312) 782-3939 • FACSIMILE: (312) 782-8585

Direct Number: (312) 269-1529
baoconnor@jonesday.com

August 3, 2005

VIA FACSIMILE

Jennifer Fountain Connolly
The Wexler Firm
One North LaSalle Street
Suite 2000
Chicago, Illinois 60602

Re: *In re Pharmaceutical Industry Average Wholesale Price Litigation*
MDL No. 1456 (D. Mass.)

Dear Jennifer:

As we discussed, we are designating Michael Sellers in response to Plaintiffs' Notice of Rule 30(b)(6) Deposition dated April 20, 2005. Mr. Sellers' deposition will take place on Wednesday, August 17, 2005 at 9:30 a.m. at the offices of Jones Day in Chicago. As we further discussed, Mr. Sellers' testimony will be limited to questions relating to "physician administered drugs."

Despite our willingness to designate Mr. Sellers, we object to certain aspects of Plaintiffs' Rule 30(b)(6) Notice. We will produce Mr. Sellers without waiving these objections, however, and I am open to discussion regarding how these topics may be revised or refined so that they seek information on topics relevant to the issues in this case.

Abbott's objections to Plaintiffs' Rule (30)(b)(6) Notice are as follows:

1. Abbott incorporates by reference all of its objections stated in its responses to Plaintiffs' Omnibus Request for Production of Documents Related to All Defendants in the MDL.
2. To the extent this notice requires Abbott to produce a corporate designee that is able to identify *all* documents or information related to a certain topic, the notice is objectionable because such testimony is not "reasonably available" to Abbott, nor is it designated with "reasonable particularity" as required by Fed. R. Civ. P. 30(b)(6).
3. Abbott objects to Topic Nos. 1, 2 and 5 because the term "physician-administered drugs" is vague and ambiguous.
4. Abbott objects to Topic Nos. 1, 2, 3 and 4 because they are overly broad and not reasonably calculated to lead to the discovery of admissible evidence to the extent they are not limited to Abbott's drugs listed in Exhibit A of the AMCC.

CHI-1489698v1

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PARIS • PITTSBURGH • SAN DIEGO • SAN FRANCISCO • SHANGHAI • SINGAPORE • SYDNEY • TAIPEI • TOKYO • WASHINGTON

JONES DAY

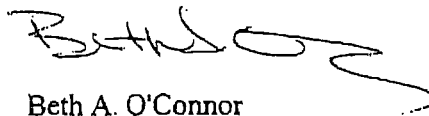
Jennifer Connolly
August 3, 2005
Page 2

5. Abbott objects to Topic No. 2 because it is vague, ambiguous and confusing to the extent it seeks information relating to "the price paid by physicians or others reimbursing for physician-administered drugs." Please clarify what information you are seeking with respect to this topic.

6. Abbott objects to Topic No. 6 because it is overly broad and seeks information that is not reasonably calculated to lead to the discovery of admissible evidence to the extent it seeks information relating to Medicare ASPs. Judge Bowler has ruled that Plaintiffs are not entitled to discovery of this information. Subject to and without waiving any of its objections, Abbott will identify a corporate designee to testify about Abbott's internal average sales price calculations.

Thank you for your attention to this matter. Please contact me if you have any questions.

Sincerely,



Beth A. O'Connor

cc: Toni-Ann Citera

Exhibit V

THE | WEXLER | FIRM ^{LLP}

August 17, 2005

Via Facsimile

Ms. Tina M. Tabacchi
Ms. Beth A. O'Connor
Jones Day
77 W. Wacker Drive
Chicago, IL 60601-1692

Re: *In re Pharmaceutical Industry Average Wholesale Price Litigation*
MDL No. 1456 (D. Mass.)

Dear Tina and Beth:

This will confirm our agreement to postpone the August 17, 2005 deposition of Mike Sellers in lieu of a more substantive deposition. In short, you informed me that, had the deposition gone forward on the 17th, Mr. Sellers would only have been designated to testify about the documents related to the areas of inquiry. However, you have agreed to reset Mr. Sellers' deposition for early to mid-September so that plaintiffs can take his deposition on more substantive topics with the view of Abbott only having to produce Mr. Sellers for his deposition once.

In that regard, you have asked me to identify the substantive topics about which I would like Mr. Sellers to be able to testify. Those topics include:

- How prices or reimbursement benchmarks on HPD physician-administered drugs are established, the persons with knowledge on this issue, and the documents related to this topic.
- The price paid by physicians or other providers for HPD physician-administered drugs, the persons with knowledge on this issue, and documents related to this topic.
- The amounts paid by third parties reimbursing for physician-administered drugs, Abbott's (HPD's) knowledge thereof, any training or education provided by HPD on that issue, the persons with knowledge on this issue, and the documents related to this topic.

Contact Information:

Jennifer Fountain Connolly
312 261 6195 Direct Dial
jfconnolly@wexlerfirm.com

One North LaSalle Street
Suite 2000
Chicago, Illinois 60602

312 346 2222
312 346 0022 fax
www.wexlerfirm.com

THE | WEXLER | FIRM^{LLP}

Ms. Tina M. Tabacchi
Ms. Beth A. O'Connor
August 17, 2005
Page 2

- The reporting structure of the sales forces at HPD, the physician-administered AWPIDs marketed and/or sold (if any) by each sales force, any persons with knowledge thereof, and any documents related thereto.¹
- The types of materials maintained, informally or formally, by the sales force, including but not limited to:
 - Call notes, trip reports, and expense reports.
 - Contracting documents.
 - Marketing documents (internal and those provided to customers).
 - Policy documents
 - Training documents
 - Any other types of documents (reports, etc.) regularly prepared by the sales staff.
- Any communications (in any media) with publishers, the identity of persons with knowledge about those communications, and any documents related to those communications.
- The identity and nature of any competitive drugs with respect to each physician-administered AWP, any persons with knowledge about this issue (*i.e.*, marketing personnel), and documents related thereto.²
- The ASPs on each (physician-administered) AWPID, the spread between ASP and AWP, how Abbott (HPD) calculates ASP, the persons with knowledge about those calculations, and any documents reflecting them.

¹ Beth has previously advised me that those sales forces include: Infusion Therapy, Pre-Operative Sales, ICCP, Renal Sales, and Alternate Site. If this is not a complete list, please advise.

² In this regard, you have suggested that the parties talk specifically about the information plaintiffs require so that you can prepare Mr. Sellers to authenticate the result of our discussions. I am willing to explore this option.

THE | WEXLER | FIRM^{LLP}

Ms. Tina M. Tabacchi
Ms. Beth A. O'Connor
August 17, 2005
Page 3

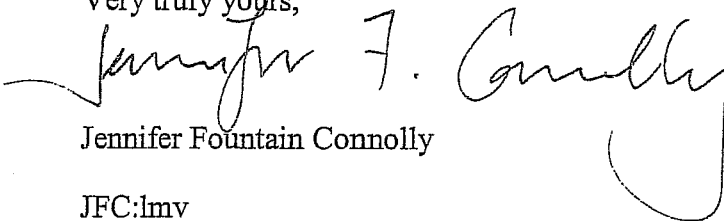
I am available the following dates in early- to mid-September for a deposition of Mr. Sellers on these topics: September 8, 9, 12, 13, and 20.

We likewise discussed several ways to shorten Mr. Sellers' deposition. You advised me that you would produce a current version of Mr. Sellers' resume, which should shorten the examination on his background. In addition, we discussed that, because Mr. Sellers' prior depositions are not admissible in this proceeding, I would have no choice but to re-examine Mr. Sellers on various issues discussed during those depositions. Given this dilemma, we discussed negotiating a stipulation on the use and admissibility of those depositions in this proceeding. I remain willing to explore such a stipulation. Please forward me a draft of what you propose.

I recognize and appreciate that Abbott wants to avoid putting Mr. Sellers up multiple times for a deposition. However, we cannot agree to make this deposition Mr. Sellers' substantive deposition until and unless Abbott can confirm that all responsive documents from Mr. Sellers' files have been produced. If Abbott can do this in the coming weeks I will certainly reconsider this issue.

Finally, you agreed to look into the status of the document production. I would like an update on this soon because we have not received documents from Abbott for several weeks. There are specific categories of documents which plaintiffs have requested in previous correspondence that Beth is aware are outstanding. And, although neither I or plaintiffs are taking an official position on this issue, given Judge Saris' opinion it does seem more important that we receive remaining HPD documents as priority over PPD documents.

Very truly yours,



Jennifer Fountain Connolly

JFC:lmv

cc: Beth Fegan (via facsimile)
Toni-Ann Citera (via facsimile)
Kenneth A. Wexler

Exhibit W

THE | WEXLER | FIRM ^{LLP}

October 6, 2005

Via Facsimile

Ms. Tina M. Tabacchi
Ms. Beth A. O'Connor
Jones Day
77 W. Wacker Drive
Chicago, IL 60601-1692

Re: *In re Pharmaceutical Industry Average Wholesale Price Litigation*
MDL No. 1456 (D. Mass.)

Dear Tina and Beth:

As you know, plaintiffs and Track Two defendants have been unable to reach agreement regarding extending the Track Two discovery deadline. Given this, please provide me with dates for Mr. Sellers' deposition. Unless Abbott has objections to them, the topics for that deposition should include all topics set forth in my August 17 letter. Before proceeding with that deposition, I would like copies of Mr. Sellers' resumé and your confirmation that all responsive documents from Mr. Sellers' files have been produced.

In addition, we discussed negotiating a stipulation to provide for the admissibility of Mr. Sellers' (or any other Abbott deponent's) prior deposition testimony in this proceeding. I have not heard back from you on that.

Further, I would like an update on the status of Abbott's document production. Given Judge Saris' ruling on plaintiffs' motion for class certification, the documents that need to be produced are those relating to physician-administered drugs. But we should talk to make sure that we are on the same page regarding which of the Abbott AWPIDs are physician-administered drugs.

Finally, I have not received any information or documents requested in my August 16 letter to Beth, which was follow-up on the Abbott electronic sales data interviews. Please advise when that information will be forthcoming.

Contact Information:

Jennifer Fountain Connolly
312 261 6195 Direct Dial
jfconnolly@wexlerfirm.com

One North LaSalle Street
Suite 2000
Chicago, Illinois 60602

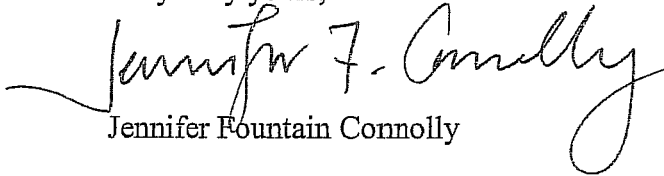
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312 346 0022 fax
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THE | WEXLER | FIRM^{LLP}

Ms. Tina M. Tabacchi
Ms. Beth A. O'Connor
October 6, 2005
Page 2

Given that we still have a discovery deadline of December 3, I expect to hear from you soon on these issues. Please feel free to call with any questions.

Very truly yours,

A handwritten signature in cursive script, reading "Jennifer F. Connolly". The signature is written in dark ink and is positioned above the printed name.

Jennifer Fountain Connolly

JFC:lmv

cc: Beth Fegan (via facsimile)
Toni-Ann Citera (via facsimile)
Kenneth A. Wexler

Exhibit X



**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

**IN RE PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESALE PRICE
LITIGATION**

MDL No. 1456

CIVIL ACTION: 01-CV-12257-PBS

Judge Patti B. Saris

NOTICE OF RULE 30(B)(6) DEPOSITION TO ABBOTT LABORATORIES

TO: ALL COUNSEL OF RECORD VIA VERILAW:

PLEASE TAKE NOTICE that pursuant to Rules 26 and 30(b)(6) of the Federal Rules of Civil Procedure, plaintiffs, by and through their counsel, will take the deposition upon oral examination of a representative of Abbott Laboratories at the offices of The Wexler Firm, One N. LaSalle Street, Suite 2000, Chicago, IL 60602 at 9:30 a.m. on Wednesday, June 23, 2005, and continuing from day to day thereafter until completed. In accordance with Fed. R. Civ. P. 30(b)(6), the deponent is advised of its duty to designate one or more of its officers, directors, or other persons to testify on its behalf with respect to the matters known or reasonably available to the deponent and referred to in the annexed Exhibit A. The deposition shall be taken before a notary public or another office authorized by law to administer oaths and will be recorded by stenographic means. You are invited to attend and participate.



DATED: May 16, 2005

Respectfully submitted,

By Kenneth A. Wexler / Jennifer F. Connolly

Kenneth A. Wexler
Jennifer Fountain Connolly
The Wexler Firm, LLP
One N. LaSalle Street
Suite 2000
Chicago, IL 60602
Telephone: 312/346-2222
Facsimile: 312/346-0022



CERTIFICATE OF SERVICE BY VERILAW

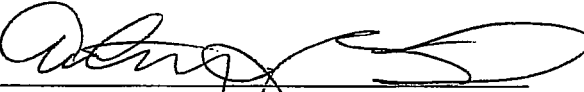
Docket No. MDL 1456

I, Anthony J. Sievert, hereby certify that I am one of plaintiffs' attorneys and that, on May 16, 2005, I caused copies of:

Notice of Rule 30(b)(6) Deposition to Abbott Laboratories

to be served on all counsel of record by causing same to be posted electronically via Verilaw.

Dated: May 16, 2005



Anthony J. Sievert

**EXHIBIT A**

Produce witnesses pursuant to Rule 30(b)(6) who have knowledge of all aspects of Abbott's maintenance and retrieval of the following data for each drug manufactured by Abbott and identified in the AMCC, including the names of the databases in which such information is stored electronically:

- (a) All sales transaction data (as well as any discounts or any other price adjustments or offsets contained in the transactional data), including (i) price, (ii) number of units sold, (iii) transaction date, (iv) information sufficient to identify the product (*e.g.*, a sale, a return, etc.), (v) information sufficient to identify the product (*e.g.* NDC, product description, form, strength, etc.), (vi) information sufficient to identify the customer, (vii) class of trade designations, and (viii) information sufficient to identify whether the units sold were intended for repackaging, along with the name of the repackager to which the units were sold.
- (b) All chargeback transactions, including (i) amount, (ii) date of credit, and (iii) information sufficient to identify the customer, class of trade designations (if any), and wholesaler to which the chargeback was paid, and (iv) the underlying contract price paid by the ultimate customer.
- (c) All rebate transactions, including (i) amount, (ii) date of rebate, (iii) information sufficient to identify the type of rebate, (iv) information sufficient to identify the customer, and (v) class of trade designations (if any).
- (d) All administrative fee transactions, including (i) amount, (ii) date of payment, (iii) information sufficient to identify the type of administrative fee (if applicable), (iv) information sufficient to identify the customer, and (v) class of trade designations (if any).
- (e) Any other discounts not reflected in the above (a through d), including but not limited to discounts achieved through bundling one product with another.

Exhibit Y

THE | WEXLER | FIRM ^{LLP}

August 16, 2005

Via Facsimile

Ms. Beth A. O'Connor
Jones Day
77 West Wacker Dr.
Chicago, IL 60601-1692

Re: *In re Pharmaceutical Industry Average Wholesale Price Litigation*
MDL No. 1456 (D. Mass.)

Dear Beth:

Thank you for producing Abbott's and TAP's three witnesses on electronic sales data. The purpose of this letter is to follow up on some issues identified during those interviews. Do not hesitate to call me with questions about them.

First, as an initial matter, Mr. Stowell stated that Abbott's electronic sales data pre-1994 was available, but might be on "legal hold." This information is slightly different than the information previously provided by Chris Cook. In this regard, please provide us with sufficiently detailed information for us (or the Court) to be able to determine if it would indeed be unduly burdensome for Abbott to retrieve pre-1994 electronic sales data. Although we will not require such a showing for anything else identified in this letter, it seems appropriate in this instance that Abbott submit any information about this undue burden in the form of an affidavit.

A. HPD Indirect Sales (ABT AWP/MDL 072220-32) (Nancy Carlson interview)

1. Please provide the data sufficient to obtain the date the wholesaler invoiced its customer for each record in the data.
2. Please provide the data that reflect the actual payments (including the amount, the date of payment, the customer receiving the payment, and the associated NDC or product code) that were made with respect to the field entitled "Customer Rebate Discount Etc. Total."
3. For some records, the field "By Group Name" is blank. *See* Exhibit A. Please explain why this is the case and let us know if it would be possible to obtain the missing information.
4. For some records, the fields beginning with "End Customer" as well as the fields "Shipto Customer Class of Trade" and "Acute (1) / Non-Acute (75)"

Contact Information:

Jennifer Fountain Connolly
312 261 6195 Direct Dial
jfconnolly@wexlerfirm.com

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Suite 2000
Chicago, Illinois 60602

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www.wexlerfirm.com

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Ms. Beth A. O'Connor
August 16, 2005
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are blank. See Exhibit B. Please explain why this is the case and let us know if it would be possible to obtain the missing information.

5. Finally, although this area was unclear, Ms. Carlson suggested that the amount of rebates actually paid out at the end of the year were available from the finance department. During the interview I asked you to investigate whether this information is available in some sort of electronic form from that department. Please let me know either way.

B. **HPD and PPD Direct Sales** (ABT AWPMDL 070783, "Small File")
TAP Direct Sales (MDL 1456 138725) (Bruce Stowell interview)

1. Please determine why some records have a blank "Customer Class" field (e.g., see "Invoice Example 1," rows 55 and 56, from the call). Is there any way to determine what the "Customer Class" code is for all of such records? If so, please provide the data or information necessary to do so.
2. Please provide the table entitled "Corporate Product Price" (CPP) in electronic format if possible or hard copy form if not. This relates to the codes appearing in the "Sales Size Code" in the data. Please confirm that this document contains descriptions of all codes appearing in this field.
3. Errors were encountered during the importation of a few anomalous records (see attached list). Please explain why these rows are different from all other rows in the data. What should be done to fix these rows?
4. If electronic data are available prior to 1994 in "legal hold" or otherwise, please provide those data.

C. **HPD Direct Sales with Rebate Accruals** (ABT AWPMDL 072207-17, "Large File") (Bruce Stowell interview)

1. Mr. Stowell said that he would attempt to determine why some records have a blank "ABT_CUST_CLS" field (see, e.g., "Abbott Rebate Example 1," row 41, from the call).
2. Please provide the table entitled "TERMS CODE" in electronic format if possible or hard copy form if not. This relates to the codes appearing in

T H E | W E X L E R | F I R M ^{LLP}

Ms. Beth A. O'Connor

August 16, 2005

Page 3

the "TERM_CD" field in the data. Please confirm that this document contains descriptions of all codes appearing in this field.

3. Please provide an explanation of why there are records in the data where MKT_DIV equals 04, 09 and 30. *See* Exhibit C. In doing so, please explain why some entries in this field say "DO NOT USE THIS NUMBER" under the "ATTN_NAME" field.
4. Please provide the table entitled "OPS Instruction Code" or "OPS Instruction Code Type Entry Table" in electronic format if possible or in hard copy form if not. This relates to the "INSTR_CD" field in the data. Please confirm that this document contains descriptions of all codes appearing in this field.
5. Please provide descriptions of the codes appearing in the "PGRP" field in the data. Please confirm that the document that will be provided contains descriptions of all codes appearing in this field.
6. Please provide the table entitled "DBCR RSN" in electronic format if possible or hard copy form if not. This relates to the codes appearing in the "RC" field in the data. Please confirm that this document contains descriptions of all codes appearing in this field.
7. The "PROD_DESC" field is blank in this data. Please confirm that the product descriptions appear in the table entitled "Corporate Product Price" (CPP) requested above.
8. Please provide the PPD direct sales data (contained in the "Small File"), as well as the TAP direct sales data, in the "Large File" format. *I.e.*, please provide the PPD and TAP data with all fields appearing in ABT AWPMDL 072207-17. We understand that the "REBATE_ACCRUAL" field may not be available for PPD or TAP direct sales data.

D. **PPD Indirect Sales** (ABT AWP/MDL 070784-93)
TAP Indirect Sales (MDL 1456 138726-34) (Jim Nowak interview)

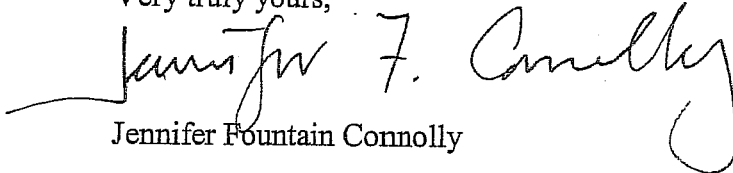
1. Please provide the data sufficient to obtain the wholesaler customer number, name and address for each record in the data.

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Ms. Beth A. O'Connor
August 16, 2005
Page 4

Finally, we need to schedule a data for an interview with Abbott's designee on the 2001-2003 rebate data. Please let me know dates when that witness will be available.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jennifer F. Connolly". The signature is fluid and cursive, with a large loop at the end of the last name.

Jennifer Fountain Connolly

JFC:lmv
Enclosures

cc: Beth Fegan (via facsimile)
Kenneth A. Wexler

Exhibit A

Records With Blank Fields in HPD Indirect Sales Data (ABT AWP/MDL 072220-32)

#	Sales Date	Full NDC	List Number	Tic Id	Sales Size	Product Description	Whislr Customer Number	Whislr Name	Whislr Address	Whislr City	Whislr State	Whislr Zip
1	03-JAN-2002	00074-1152-78	01152	78	14	HEPARN 100UNIT/ML	50493741	MCKESSON DRUG CO	2700 N AMERICA DR	WEST SENECA	NY	14224
2	03-JAN-2002	00074-1152-78	01152	78	14	HEPARN 100UNIT/ML	50493287	MCKESSON DRUG CO	2975 EVERGREEN DR	DULUTH	GA	30096
3	03-JAN-2002	00074-1152-78	01152	78	14	HEPARN 100UNIT/ML	50493287	MCKESSON DRUG CO	2975 EVERGREEN DR	DULUTH	GA	30096
4	03-JAN-2002	00074-1152-78	01152	78	14	HEPARN 100UNIT/ML	50493253	MCKESSON DRUG CO	280 DIVIDEND RD	ROCKY HILL	CT	06067
5	03-JAN-2002	00074-1152-78	01152	78	14	HEPARN 100UNIT/ML	50493618	MCKESSON DRUG CO	2323 N 27TH AVE	PHOENIX	AZ	85009
6	03-JAN-2002	00074-1152-78	01152	78	14	HEPARN 100UNIT/ML	50493618	MCKESSON DRUG CO	2323 N 27TH AVE	PHOENIX	AZ	85009
7	03-JAN-2002	00074-1152-78	01152	78	14	HEPARN 100UNIT/ML	50493618	MCKESSON DRUG CO	2323 N 27TH AVE	PHOENIX	AZ	85009
8	03-JAN-2002	00074-1584-11	01584	11	11	0.9% SOD CHL P-F	51441640	OWENS & MINOR INC 90	2475 S 3200TH W #A	WEST VALLEY CITY	UT	84119
9	03-JAN-2002	00074-1584-11	01584	11	11	0.9% SOD CHL P-F	51370682	OWENS & MINOR 81	6585 E 30TH ST	HEBRON	IN	46219
10	03-JAN-2002	00074-1584-11	01584	11	11	0.9% SOD CHL P-F	51374833	OWENS MINOR J1T 75	1605 WORLDWIDE BLVD	INDIANAPOLIS	IN	41046
11	03-JAN-2002	00074-1584-11	01584	11	11	0.9% SOD CHL P-F	51370682	OWENS & MINOR 81	6585 E 30TH ST	HEBRON	IN	41046
12	03-JAN-2002	00074-1584-11	01584	11	11	0.9% SOD CHL P-F	50699206	CARDINAL HLTH WHITMIRE	3238 DWIGHT RD	ELK GROVE	CA	46219
13	03-JAN-2002	00074-1584-11	01584	11	11	0.9% SOD CHL P-F	50699206	CARDINAL HLTH WHITMIRE	3238 DWIGHT RD	ELK GROVE	CA	46219
14	03-JAN-2002	00074-1152-78	01152	78	14	HEPARN 100UNIT/ML	50493949	MCKESSON DRUG CO	6012 E MOLLOY RD	SYRACUSE	NY	13211
15	03-JAN-2002	00074-1152-78	01152	78	14	HEPARN 100UNIT/ML	50698372	MCKESSON DRUG CO	2798 NEW BUTLER #RD-205	NEW CASTLE	PA	16101
16	03-JAN-2002	00074-1152-78	01152	78	14	HEPARN 100UNIT/ML	50698372	AMERISOURCE CORP	3910 SEAPORT BLVD	WEST SACRAMENTO	CA	95691
17	03-JAN-2002	00074-1152-78	01152	78	14	HEPARN 100UNIT/ML	50698372	AMERISOURCE CORP	3910 SEAPORT BLVD	WEST SACRAMENTO	CA	95691
18	03-JAN-2002	00074-1152-78	01152	78	14	HEPARN 100UNIT/ML	50698372	AMERISOURCE CORP	107 S 41ST AVE	PHOENIX	AZ	85009
19	03-JAN-2002	00074-1152-78	01152	78	14	HEPARN 100UNIT/ML	50494038	AMERISOURCE CORP	21129 TIMBERLAKE RD	LYNCHBURG	VA	24502
20	03-JAN-2002	00074-1273-02	01273	02	02	DIAZEPAM SMG CPJT	50493865	MORRIS & DICKSON CO	410 KAY LN	SHREVEPORT	LA	71115
21	03-JAN-2002	00074-1273-02	01273	02	02	DIAZEPAM SMG CPJT	50493865	MORRIS & DICKSON CO	410 KAY LN	SHREVEPORT	LA	71115
22	03-JAN-2002	00074-1273-02	01273	02	02	DIAZEPAM SMG CPJT	50493865	MORRIS & DICKSON CO	410 KAY LN	SHREVEPORT	LA	71115
23	03-JAN-2002	00074-1273-02	01273	02	02	DIAZEPAM SMG CPJT	50493865	MORRIS & DICKSON CO	410 KAY LN	SHREVEPORT	LA	71115
24	03-JAN-2002	00074-1273-02	01273	02	02	DIAZEPAM SMG CPJT	51413151	CARDINAL HLTH	1800 S 4490TH W	SALT LAKE CITY	UT	84104
25	03-JAN-2002	00074-1273-02	01273	02	02	DIAZEPAM SMG CPJT	51413151	CARDINAL HLTH	2353 PROSPECT DR	AURORA	IL	60504
26	03-JAN-2002	00074-1273-02	01273	02	02	DIAZEPAM SMG CPJT	51413151	CARDINAL HLTH	2353 PROSPECT DR	AURORA	IL	60504
27	03-JAN-2002	00074-1273-02	01273	02	02	DIAZEPAM SMG CPJT	51413151	CARDINAL HLTH	2353 PROSPECT DR	AURORA	IL	60504
28	03-JAN-2002	00074-1273-02	01273	02	02	DIAZEPAM SMG CPJT	51413151	CARDINAL HLTH	2353 PROSPECT DR	AURORA	IL	60504
29	03-JAN-2002	00074-1273-02	01273	02	02	DIAZEPAM SMG CPJT	51413151	CARDINAL HLTH	2353 PROSPECT DR	AURORA	IL	60504
30	03-JAN-2002	00074-1522-03	01522	03	03	5% DEXTROSE INJ	50493865	MORRIS & DICKSON CO	410 KAY LN	SHREVEPORT	LA	71115

Records With Blank Fields in HPD Indirect Sales Data (ABT AWP/MDL 072220-32)

#	Buy Group Name	End Customer Number	End Customer Name	End Customer Address	End Customer City	End Customer State	End Customer Zip	Ship to Customer Class of Trade
1	PREMIER, INC.	50309236	ROCHESTER GENL HOSP	1425 PORTLAND AVE	ROCHESTER	NY	14621	HO21
2	MANAGED HEALTHCARE ASSOC	52186466	PHARM SAVE III INC	1010 N MAIN ST	MOORESVILLE	NC	28115	AO03
3	PACT	51362507	HCA PKWY MED CTR	1000 THORNTON RD	LITHIA SPRINGS	GA	30122	MO21
4	AMERINET PHARMACY	50304187	ADIRONDACK MED CTR	LAKE COLBY DR	SARANAC LAKE	NY	12983	HO21
5	PACT	50169747	MARYVALE MEDCL CTR	5102 W CAMPBELL AVE	PHOENIX	AZ	85031	HO21
6	INNOVATIX, LLC	09301409	MEDCAST HM INFUSION	2603 N STANTON ST	EL PASO	TX	79902	PO40
7	PHARMACEUTICAL BUYERS	52414067	GARFIELD MEML HOSP	200 N 400TH E	PANGUITCH	UT	84759	HO21
8	AMERINET PHARMACY	52447414	BLOOMINGTON HOSP	605 W 2ND ST	BLOOMINGTON	IN	47403	HO21
9	AMERINET VALUHEALTH	50240779	CHRIST HOSP PHCY	2139 AUBURN AVE	CINCINNATI	OH	45219	HO21
10	AMERINET VALUHEALTH	51411841	BLOOMINGTON HOSP	605 W 2ND ST	BLOOMINGTON	IN	47403	HO21
11	UCSF STANFORD HEALTH CARE	51598662	UCSF STANFORD HLTH CARE	PO BOX 0816	SAN FRANCISCO	CA	94143	TP25
12	CORAM HEALTHCARE	50737022	CORAM HLTHCARE	1 CHARLES PK BLVD	GUILDERLAND	NY	12084	PO40
13	NOVATION	50341775	MERCY JEANNETTE HOSP	600 JEFFERSON AVE	JEANNETTE	PA	15844	HO21
14	NOVATION	51663665	MERCY JEANNETTE HOSP	1700 COFFEE RD	MODESTO	CA	95353	HO21
15	NOVATION	00534776	MERCY JEANNETTE HOSP	1700 COFFEE RD	MODESTO	CA	95353	HO21
16	VA AND DGAS	51457285	CARL T HAYDEN V A MED CT	650 E INDIAN SCHOOL RD	PHOENIX	AZ	85012	US30
17	AMERINET/ALT SITE-PHCY	52182813	J & A PHARMACTCL SVC	RTE 10 HWY 19E	BURNSVILLE	NC	28714	AO03
18	NOVATION	50995339	SLIDELL MEML HOSP MED CT	1001 GAUSE BLVD	SLIDELL	LA	70458	TO22
19	WHOLESALE CUSTOMER PROGM	50979160	FRANKLIN PRSH HOSP SRV	2106 LOOP RD	WINNSBORO	LA	71295	TO22
20	WHOLESALE CUSTOMER PROGM	52417342	JOBE DRUG CO	100 S MAIN ST	GLADEWATER	TX	75647	AO03
21	AMERINET PHARMACY	52445004	GUNNISON VLY HOSP	64 E N #100	GUNNISON	UT	84634	TO22
22	PREMIER, INC.	51449676	DEAN MEDCL CTR	1513 EMIL ST	MADISON	WI	53713	AO10
23	OWEN HEALTHCARE, INC.	14751846	ST ANTHONY MEM HLTH CTRS	301 W HOMER ST	MICHIGAN CITY	IN	46360	HO21
24	CONSORTIA, INC	51371359	ST JOSEPH HOSP PHCY	5000 W CHAMBERS ST	MILWAUKEE	WI	53210	MO21
25	CONSORTIA, INC	52702164	PROVENA ST MARYS HOSP	500 W CT ST	KANKAKEE	IL	60901	HO21
26	CONSORTIA, INC	51367548	GERBER MEML HOSP	214 S SULLIVAN ST	FREMONT	MI	49412	HO21
27	NOVATION	50979816	ST ANTHONYS MED CTR	10010 KENNERLY	SAINT LOUIS	MO	63128	HO21
28	NOVATION	52040664	ST ANTHONYS MED CTR	10010 KENNERLY	SAINT LOUIS	MO	63128	HO21

Records With Blank Fields in HPD Indirect Sales Data (ABT AWP/MDL 072220-32)

#	Acute (1) / Non-Acute (75)	Purchase Units	WAC Total	Whsfr Chargeback Total	End Customer Contract Price per Unit	End Customer Invoice Total	Customer Rebate, Discount, Etc. Total
1	01	25	18.5	9.25	.37	9.25	.39
2	75	50	37	17.5	.39	19.5	.58
3	01	25	18.5	9.75	.35	8.75	.32
4	01	50	37	19.5	.35	17.5	.6
5	01	50	37	19.5	.35	17.5	.65
6	01	50	37	14.5	.45	22.5	.68
7	75	50	37	15.5	.43	21.5	.44
8	01	24	237.12	129.12	4.5	108	7.46
9	01	12	118.56	61.56	4.75	57	0
10	01	12	118.56	106.42	1.012	12.14	1.46
11	01	48	474.24	246.24	4.75	228	0
12	01	96	948.48	516.48	4.5	432	66.56
13	75	100	74	38	.36	36	3.24
14	01	25	18.5	9.75	.35	8.75	.68
15	01	150	111	58.5	.35	52.5	4.08
16	01	25	18.5	9.75	.35	8.75	.68
17	01	50	37	19.06	.359	17.95	.1
18	75	650	481	253.5	.35	227.5	7.75
19	01	50	76.35	12	1.287	64.35	3.15
20	01	20	30.54	.6	1.497	29.94	.6
21	75	10	15.27	.3	1.497	14.97	.3
22	01	10	15.27	2.37	1.29	12.9	.44
23	75	10	15.27	2.48	1.282	12.82	1.03
24	01	20	30.54	4.84	1.288	25.76	1.54
25	01	10	15.27	2.5	1.28	12.8	.9
26	01	40	61.08	9.88	1.28	51.2	3.6
27	01	10	15.27	2.5	1.28	12.8	.9
28	01	30	45.81	7.29	1.287	38.61	1.89
29	01	12	48	41.57	.536	6.43	.58

Exhibit B

Anomalous Records in Abbott Direct Sales Data (ABT AWPMDL 070783)

P_AMCCABT195695.TXT, row 27556: "JEFF PUTERBAUGH	"7410 98TH AVE,"F"	"KENOSHA WI 53142	"02","23","95"	"	"02586","11","06"	6"	0.00"
P_AMCCABT195695.TXT, row 43621: "JEFF PUTERBAUGH	"7410 98TH AVE,"F"	"KENOSHA WI 53142	"03","15","95"	"	"02586","11","06"	6"	0.00"
P_AMCCABT195695.TXT, row 14110: "JEFF PUTERBAUGH	"7410 98TH AVE,"F"	"KENOSHA WI 53142	"09","26","95"	"	"02586","11","06"	12"	0.00"
P_AMCCABT195695.TXT, row 27087: "JEFF PUTERBAUGH	"7410 98TH AVE,"F"	"KENOSHA WI 53142	"10","18","95"	"	"02586","11","06"	12"	0.00"

Exhibit C

HPD Direct Sales Records Where MKT_DIV = 04, 09 and 30

#	CUST_NBR_STO	CUST_NBR_BT	CUST_TYP	CUST_NAM	ATTN_NAM	CUST_ADDR	CSZ	ABT_CUST_CLS	VERTEX_GEO_ST	VERTEX_GEO_CNTRY
1	51467916	53192019		RC3 KALAMAZOO	PAUL KOKATES	521 E MICHIGAN AVE	KALAMAZOO MI 49007	M033	23	077
2	53198289	53198289		RAHINU PHCY INC	718-991-7550	607 SOUNDVIEW AVE	BROXN NY 10473	M033	33	005
3	531480135	53196507		GENM ST DIALYSIS	208-522-4831	2225 TETON PLZ	IDAHO FALLS ID 83401	M033	13	019
4	53196507	53196507		UNIV OF UT	DIALYSIS PROGRAM	85 N MEDICAL DR FRNT	SALT LAKE CITY UT 84112	H033	45	035
5	53201422	53201422		COMPTON COMM HEMO	DIALYSIS CENTER	801 W COMPTON BLVD	COMPTON CA 90220	M033	05	037
6	52436573	52436573		UNIV HOSP	ACCTS PAYABLE/PHCY SVC	4502 MEDICAL DR	SAN ANTONIO TX 78229	M033	44	029
7	51717627	51717627		CT VLY HOSP	PHARMACEUTICAL SVC DEPT	SILVER ST	LOS ANGELES CA 90095	TP25	07	007
8	51327195	51596997		UNIV OF CA LA MED REC	PHARMACEUTICAL SVC DEPT	650 CHARLES E YOUNG DR	MIDDLETOWN CT 06457	TP25	05	007
9	51717627	51717627		CT VLY HOSP	SILVER ST	SILVER ST	MIDDLETOWN CT 06457	TP25	07	007
10	51327948	51634798		KABER FNDTN HLTH PLAN	DBA KAISER PERM PHCY	4700 SUNSET BLVD	LOS ANGELES CA 90027	HK21	05	037
11	53198248	53198248		BROOKDALE PHYS DLYS	718-495-4680	9701 CHURCH AVE	BROOKLYN NY 11212	M033	33	047
12	531339831	51699441		CHEMIEQUE PHARMACTCL	SERV	13306 E WHITTIER BLVD	WHITTIER CA 90602	M075	05	037
13	53192993	53192993		ANTELOPE VLY DIALYSIS	661-948-5811	44203 15TH ST W	LANCASTER CA 93534	M033	05	037
14	53195772	53195772		PUGET SOUND KID CTR	425-299-5195	1005 PACIFIC AVE	EVERETT WA 98201	M033	48	061
15	51490280	53192621		LAKE CHARLES DIALYSIS	SUPPLY INC	1801 OAK PARK BLVD	WESTBURY NY 11580	M033	19	019
16	52791365	52791365		BURNS VETERNRY	SONOMA COMM MAGNE, DVM	865 MERRICK AVE	LYNNWOOD WA 98037	C035	33	059
17	51463214	52791407		ANIMAL CARE CTR OF	SONOMA COMM MAGNE, DVM	6470 REDWOOD DR	ROHNERT PARK CA 94928	C020	05	097
18	51472595	52791407		WA BUTLER CO	9494 SW TUALATIN	7940 W DOE AVE #400	VISALIA CA 93291	C035	05	107
19	51472595	52792173		WA BUTLER CO	9494 SW TUALATIN	7940 W DOE AVE #400	VISALIA CA 93291	C035	38	107
20	51462562	52792173		THE BUTLER CO	STOCKROOM #04	1001 AIRPARK DR	MIDDLETOWN PA 17057	C035	33	005
21	51465540	52792173		WA BUTLER CO	STOCKROOM #04	445 SW 52ND AVE #100	OCALA FL 34474	C035	10	083
22	51462547	52792173		WA BUTLER CO	STOCKROOM #04	SHERWOOD RD	TUALATIN OR 97062	C035	48	061
23	53177538	52791415		WEBSTER VET SPLY INC	STOCKROOM #04	12407A MULIKTEO SPEEDWY	LYNNWOOD WA 98037	C035	29	031
24	51469781	52791365		BURNS VET SPLY	(DARBY FIL FILMENT SERV)	VAN BUREN BLVD BLDG 27	GUILDERLAND CENTER NY 12	C035	33	001
25	51469781	52791365		BURNS VET SPLY	(DARBY FIL FILMENT SERV)	VAN BUREN BLVD BLDG 27	GUILDERLAND CENTER NY 12	C035	33	001
26	51465128	52791365		HARDO DRUGS INC	DBA DARBY GRP COMPANIES	4795 LONGLEY LN	RENO NV 89502	C035	29	031
27	51465128	52791365		HARDO DRUGS INC	DBA DARBY GRP COMPANIES	4795 LONGLEY LN	RENO NV 89502	C035	29	031
28	51465128	52791365		HARDO DRUGS INC	DBA DARBY GRP COMPANIES	4795 LONGLEY LN	RENO NV 89502	C035	29	031
29	51465128	52791365		HARDO DRUGS INC	DBA DARBY GRP COMPANIES	4795 LONGLEY LN	RENO NV 89502	C035	29	031
30	51465128	52791365		HARDO DRUGS INC	DBA DARBY GRP COMPANIES	4795 LONGLEY LN	RENO NV 89502	C035	29	031
31	51465128	52791365		HARDO DRUGS INC	DBA DARBY GRP COMPANIES	4795 LONGLEY LN	RENO NV 89502	C035	29	031
32	51465128	52791365		HARDO DRUGS INC	DBA DARBY GRP COMPANIES	4795 LONGLEY LN	RENO NV 89502	C035	29	031
33	51465128	52791365		HARDO DRUGS INC	DBA DARBY GRP COMPANIES	4795 LONGLEY LN	RENO NV 89502	C035	29	031
34	51465128	52791365		HARDO DRUGS INC	DBA DARBY GRP COMPANIES	4795 LONGLEY LN	RENO NV 89502	C035	29	031
35	51465128	52791365		HARDO DRUGS INC	DBA DARBY GRP COMPANIES	4795 LONGLEY LN	RENO NV 89502	C035	29	031
36	51465128	52791365		HARDO DRUGS INC	DBA DARBY GRP COMPANIES	4795 LONGLEY LN	RENO NV 89502	C035	29	031
37	51465128	52791365		HARDO DRUGS INC	DBA DARBY GRP COMPANIES	4795 LONGLEY LN	RENO NV 89502	C035	29	031
38	51465128	52791365		HARDO DRUGS INC	DBA DARBY GRP COMPANIES	4795 LONGLEY LN	RENO NV 89502	C035	29	031
39	51465128	52791365		HARDO DRUGS INC	DBA DARBY GRP COMPANIES	4795 LONGLEY LN	RENO NV 89502	C035	29	031
40	51465128	52791365		HARDO DRUGS INC	DBA DARBY GRP COMPANIES	4795 LONGLEY LN	RENO NV 89502	C035	29	031
41	51465128	52791365		HARDO DRUGS INC	DBA DARBY GRP COMPANIES	4795 LONGLEY LN	RENO NV 89502	C035	29	031
42	51465128	52791365		HARDO DRUGS INC	DBA DARBY GRP COMPANIES	4795 LONGLEY LN	RENO NV 89502	C035	29	031
43	51465128	52791365		HARDO DRUGS INC	DBA DARBY GRP COMPANIES	4795 LONGLEY LN	RENO NV 89502	C035	29	031
44	51465128	52791365		HARDO DRUGS INC	DBA DARBY GRP COMPANIES	4795 LONGLEY LN	RENO NV 89502	C035	29	031
45	51465128	52791365		HARDO DRUGS INC	DBA DARBY GRP COMPANIES	4795 LONGLEY LN	RENO NV 89502	C035	29	031
46	51465128	52791365		HARDO DRUGS INC	DBA DARBY GRP COMPANIES	4795 LONGLEY LN	RENO NV 89502	C035	29	031
47	51465128	52791365		HARDO DRUGS INC	DBA DARBY GRP COMPANIES	4795 LONGLEY LN	RENO NV 89502	C035	29	031
48	51465128	52791365		HARDO DRUGS INC	DBA DARBY GRP COMPANIES	4795 LONGLEY LN	RENO NV 89502	C035	29	031

HPD Direct Sales Records Where MKT_DIV = 04, 09 and 30

#	VERTEX_GEO_CITY	TERM_CD	MTH	DAY	YR	INVC_NBR_HI_ORD	INVC_NBR_LO_ORD	BR_DISTRT_CNTR	SLS_TC	LIST_NBR	TUC_TUC	INV_SC	SLSZ_CD	MKT_DIV	INSTR_CD	PGRP
1	0960	33	09	29	04	4	0868	25	01	0810	31	31	01	04	00	760
2	2010	14	09	29	04	4	0869	25	04	0810	31	31	01	04	00	760
3	0130	14	07	30	04	1	4583	36	04	0810	31	31	01	04	00	760
4	0270	14	07	30	04	1	4584	36	04	0810	31	31	01	04	00	760
5	0730	14	07	30	04	1	4586	36	04	0810	31	31	01	04	00	760
6	2570	04	07	30	04	1	6220	17	04	0810	31	31	01	04	00	760
7	0240	04	07	30	04	0	0041	21	01	0810	31	31	01	04	00	760
8	1900	04	07	30	04	0	0042	21	01	0810	31	31	01	04	00	760
9	0240	04	07	30	04	0	5636	17	01	0810	31	31	01	04	00	760
10	0900	14	07	29	04	0	0035	25	04	0810	31	31	01	04	00	760
11	0210	03	07	28	04	6	0790	25	01	0810	31	31	01	04	00	760
12	0790	14	07	28	04	1	3188	36	04	0810	31	31	01	04	00	760
13	0710	14	07	28	04	1	3190	36	01	0810	31	31	01	04	00	760
14	0230	33	07	28	04	1	3191	36	01	0810	31	31	01	04	00	760
15	0510	33	07	28	04	1	7613	37	01	0810	31	31	01	04	00	760
16	0150	92	09	30	04	2	4610	25	01	07983	09	39	19	09	70	760
17	2865	04	09	30	04	0	7721	36	01	0738	09	29	13	09	18	275
18	0690	04	09	30	04	0	7730	36	01	03213	02	02	59	09	18	275
19	0690	04	09	30	04	0	7731	36	01	07985	09	39	59	09	18	275
20	0828	04	09	30	04	0	7732	36	01	07985	09	39	59	09	18	275
21	2360	04	09	30	04	0	9895	37	01	03213	02	02	59	09	18	275
22	0110	04	09	30	04	0	9896	37	01	07972	08	02	18	09	18	275
23	0370	99	09	24	04	0	6379	36	01	07983	03	03	60	09	74	271
24	0536	04	09	24	04	0	0009	FX	01	07983	09	39	60	09	18	275
25	5366	04	09	24	04	0	0008	FX	01	07983	09	39	19	09	18	275
26	0100	04	09	24	04	0	0028	FY	01	07983	02	02	11	09	18	275
27	0100	04	09	24	04	0	0094	FX	01	07983	02	02	11	09	18	275
28	0100	13	12	15	94	0	0097	FX	01	07983	02	02	11	09	18	275
29	0100	13	12	15	94	0	0097	FX	01	07983	02	02	11	09	18	275
30	0100	13	12	15	94	0	0097	FX	01	07983	02	02	11	09	18	275
31	0100	13	12	15	94	0	0097	FX	01	07983	02	02	11	09	18	275
32	0100	13	12	15	94	0	0097	FX	01	07983	02	02	11	09	18	275
33	0100	13	12	15	94	0	0097	FX	01	07983	02	02	11	09	18	275
34	0100	13	12	15	94	0	0097	FX	01	07983	02	02	11	09	18	275
35	0100	13	12	15	94	0	0097	FX	01	07983	02	02	11	09	18	275
36	0100	13	12	15	94	0	0097	FX	01	07983	02	02	11	09	18	275
37	0100	13	12	15	94	0	0097	FX	01	07983	02	02	11	09	18	275
38	0100	13	12	15	94	0	0097	FX	01	07983	02	02	11	09	18	275
39	0100	13	12	15	94	0	0097	FX	01	07983	02	02	11	09	18	275
40	0100	13	12	15	94	0	0097	FX	01	07983	02	02	11	09	18	275
41	0100	13	12	15	94	0	0097	FX	01	07983	02	02	11	09	18	275
42	0100	13	12	15	94	0	0097	FX	01	07983	02	02	11	09	18	275
43	0100	13	12	15	94	0	0097	FX	01	07983	02	02	11	09	18	275
44	0100	13	12	15	94	0	0097	FX	01	07983	02	02	11	09	18	275
45	0100	13	12	15	94	0	0097	FX	01	07983	02	02	11	09	18	275
46	0100	13	12	15	94	0	0097	FX	01	07983	02	02	11	09	18	275
47	0100	13	12	15	94	0	0097	FX	01	07983	02	02	11	09	18	275
48	0100	13	12	15	94	0	0097	FX	01	07983	02	02	11	09	18	275
49	0100	13	12	15	94	0	0097	FX	01	07983	02	02	11	09	18	275
50	0100	13	12	15	94	0	0097	FX	01	07983	02	02	11	09	18	275

HPD Direct Sales Records Where MKT_DIV = 04, 09 and 30

#	DEPT_WMN_LDRG	QTY_BY_SLSSZ	QTY_BY_INV_SZ	LN_XTN	CONTR_NBR	LBL_CD	LN_WT_TOT	NBR_PROF_DIV	BOL_NBR_INV_LOC	INVC_TOT_AMT	TAX_AMT	HNDL_CHRG	DELY_CHRG_AMT
1	209	1	100	1085.00	000003560002	04	1	04	060284857183143	1085.00	0.00	0	0
2	209	2	100	1225.00	D0000002421	04	1	04	060284857183174	1225.00	0.00	0	0
3	223	3	300	3675.00	D0000002421	04	3	04	016059713688884	3675.00	0.00	0	0
4	223	3	300	3675.00	D0000002421	04	3	04	016059713688821	3675.00	0.00	0	0
5	223	2	200	2450.00	D0000002421	04	2	04	016059713688600	2450.00	0.00	0	0
6	209	1	100	1085.00	00000251036	04	1	04	649702823620	1135.33	0.00	0	50.3
7	223	1	100	1085.00	000003560009	04	1	04	016059713691563	1085.00	0.00	0	0
8	223	1	100	1085.00	000003567018	04	1	04	016059713691549	1085.00	0.00	0	0
9	209	1	100	1085.00	000003560009	04	1	04	06028485652695	1085.00	0.00	0	0
10	223	24	2400	29400.00	D0000002421	04	31	04	016059713684817	29400.00	0.00	0	0
11	209	20	2000	21700.00	000003594001	04	26	04	06028485648155	21700.00	0.00	0	0
12	223	1	100	1225.00	D0000002422	04	1	04	016059713680215	1225.00	0.00	0	0
13	223	1	100	1085.00	000003610004	04	1	04	016059713680208	1085.00	0.00	0	0
14	223	1	100	1085.00	000004373002	04	1	04	016059713679752	1085.00	0.00	0	0
15	201	1	100	1085.00	000004373002	04	1	04	030102215339386	1133.82	48.82	0	0
16	209	0	0	-19.49		04	30	09		-4767.11	0.00	0	0
17	223	2	24	33.78		04	61	09		110.58	0.00	0	0
18	223	20	500	495.00		04	36	09		495.00	0.00	0	0
19	223	4	48	63.56		04	122	09		11273.54	0.00	0	0
20	223	3	36	47.67		04	91	09		3313.93	0.00	0	0
21	201	8	200	198.00		04	14	09		198.00	0.00	0	0
22	201	4	16	86.08		04	120	09		1699.68	0.00	0	0
23	223	-8	-200	-198.00		04	14	09		-198.00	0.00	0	0
24	259	3	72	102.96		04	98	09		7609.50	0.00	0	0
25	259	24	288	467.76		04	732	09		7609.50	0.00	0	0
26	261	1	12	22.47		04	30	09		2509.18	0.00	0	0
27	261	3	72	114.00		04	54	09		2509.18	0.00	0	0
28	954	11	264	208.56		04	198	30		8531.76	0.00	0	0
29	954	24	288	264.96		04	756	30		14042.36	0.00	0	0
30	954	3	72	56.88		04	54	30		14042.36	0.00	0	0
31	954	3	432	397.44		04	91	30		21455.84	0.00	0	0
32	954	36	120	94.80		04	1134	30		42086.92	0.00	0	0
33	954	5	72	59.76		04	99	30		319.00	0.00	0	0
34	956	6	72	110.44		04	335	30		31133.48	0.00	0	0
35	954	11	44	208.56		04	198	30		31133.48	0.00	0	0
36	954	21	264	209.16		04	682	30		31133.48	0.00	0	0
37	956	22	264	240.24		04	34	30		10987.20	0.00	0	0
38	956	1	36	19.68		04	544	30		10987.20	0.00	0	0
39	956	1	36	19.68		04	252	30		10987.20	0.00	0	0
40	954	16	384	299.52		04	34	30		10987.20	0.00	0	0
41	954	8	24	19.68		04	544	30		10987.20	0.00	0	0
42	954	1	96	88.32		04	252	30		10987.20	0.00	0	0
43	954	36	144	361.44		04	1098	30		10987.20	0.00	0	0
44	954	180	2160	1879.20		04	5670	30		10987.20	0.00	0	0
45	954	3	72	59.04		04	102	30		13206.24	0.00	0	0
46	954	36	432	397.44		04	1134	30		13206.24	0.00	0	0
47	954	2	48	37.92		04	36	30		13206.24	0.00	0	0
48	954	32	768	599.04		04	1088	30		13206.24	0.00	0	0

HPD Direct Sales Records Where MKT_DIV = 04, 09 and 30

#	TAX_RATE	TAXE_MOSE	PO_NBR_CUST	CARR_4_CHAR	ABT_CUST_NBR_XREF	FC_XTN_XCOP	INVC_NBR	SAP_DELV_NBR	RC	PROD_TAX_GRP	PROD_DESC	REBATE_ACCRUAL	FILLER
1	0.0000	0.00		BRPS		0	916195986	720192726	00			0	
2	0.0000	0.00		BRPS		0	916195988	720189338	00			0	
3	0.0000	0.00		BRPS		0	909831525	710140980	00			0	
4	0.0000	0.00		BRPS		0	909831526	710140982	00			0	
5	0.0000	0.00		BRPS		0	909831528	710126341	00			0	
6	0.0000	0.00		FEDE		0	909835981	710150279	00			0	
7	0.0000	0.00		BRPS		0	909835564	710150034	00			0	
8	0.0000	0.00		BRPS		0	909835562	710150129	00			0	
9	0.0000	0.00		BRPS		0	909818392		00			0	
10	0.0000	0.00		BRPS		0	909822949		00			0	
11	0.0000	0.00		BRPS		0	909810748	710127334	00			0	
12	0.0000	0.00		BRPS		0	909809749	710117466	00			0	
13	0.0000	0.00		BRPS		0	909809763	710120595	00			0	
14	0.0000	0.00		BRPS		0	909809764	710114975	00			0	
15	0.0000	1085.00		BRPS		0	909807367	710100573	00			0	
16	0.0000	0.00				0	810031331		P8			0	
17	0.0000	0.00				0	916202972	110117775	00			0	
18	0.0000	0.00				0	916203514	110135948	00			0	
19	0.0000	0.00				0	916203516	110137415	00			0	
20	0.0000	0.00				0	916203520	110137496	00			0	
21	0.0000	0.00				0	916203998	110051712	00			0	
22	0.0000	0.00				0	916203999	110135714	00			0	
23	0.0000	0.00				0	810025361		C9			0	
24	0.0000	0.00				0	916171381	110116028	00			0	
25	0.0000	0.00				0	916171381	110116028	00			0	
26	0.0000	0.00				0	916169138	110111749	00			0	
27	0.0000	0.00				0	916169138	110111749	00			0	
28	0.0000	8531.76				0						0	
29	0.0000	14042.36				0						0	
30	0.0000	14042.36				0						0	
31	0.0000	14042.36				0						0	
32	0.0000	21455.84				0						0	
33	0.0000	21455.84				0						0	
34	0.0000	42086.92				0						0	
35	0.0000	319.00				0						0	
36	0.0000	319.00				0						0	
37	0.0000	31133.48				0						0	
38	0.0000	31133.48				0						0	
39	0.0000	31133.48				0						0	
40	0.0000	10987.20				0						0	
41	0.0000	10987.20				0						0	
42	0.0000	10987.20				0						0	
43	0.0000	10987.20				0						0	
44	0.0000	13206.24				0						0	
45	0.0000	13206.24				0						0	
46	0.0000	13206.24				0						0	
47	0.0000	13206.24				0						0	
48	0.0000	13206.24				0						0	

MTEN

***3